

ALLACCESS LAW GROUP
Irene Karbelashvili, State Bar Number 232223
irene@allaccesslawgroup.com
Irakli Karbelashvili, State Bar Number 302971
irakli@allaccesslawgroup.com
19 North Second Street, Suite 205
San Jose, CA 95113
Telephone: (408) 295-0137
Facsimile: (408) 295-0142

Attorneys for VALENTINA RYSS, Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

_____)	Case No. 18-cv-02968-NC
VALENTINA RYSS)	
)	STIPULATION AND ORDER
Plaintiff,)	DISMISSING ACTION WITH
)	PREJUDICE
vs.)	
)	
KOHL'S DEPARTMENT STORES INC, et)	
al.)	
)	
Defendants.)	
)	
_____)	

Plaintiff VALENTINA RYSS ("Plaintiff") and Defendants KOHL'S DEPARTMENT STORES, INC., a Delaware Corporation, d/b/a KOHL'S CAMPBELL; and MARC W. BUZOLICH, an individual, and LYNN A. BUZOLICH, an individual, collectively in their individual and representative capacities as trustees of THE MARC W. BUZOLICH LIVING TRUST (collectively, "Defendants") hereby stipulate and ask that the Court dismiss this action with prejudice pursuant to FRCP 41(2) with each side bearing her/its own attorneys' fees, costs,

STIPULATION AND ~~PROPOSED~~ ORDER DISMISSING ACTION WITH PREJUDICE
CASE NO. 18-cv-02968-NC

1 and litigation expenses. The parties further stipulate and request that the Court retain jurisdiction
2 over enforcement of the terms of their settlement agreement, if such enforcement is necessary.

3
4 Respectfully submitted,

5
6 Dated: May 16, 2019

By: /s/ Matthew R. Orr

Matthew R. Orr Attorneys for Defendants
Kohl's Department Stores, Inc. dba Kohl's
Campbell, Mark W. Buzolich, Lynn A.
Buzolich, and The Mark W. Buzolich Living
Trust

7
8
9
10
11
12 Dated: May 15, 2019

By: /s/ Irakli Karbelashvili

Irakli Karbelashvili
Attorneys for Plaintiff
VALENTINA RYSS

13
14
15 SIGNATURE CERTIFICATION

16 I hereby certify that the content of this document is acceptable to Matthew Orr, counsel
17 for Defendant and that I have obtained Mr. Orr's authorization to affix his electronic signature to
18 this document.

19
20 By: /s/ Irakli Karbelashvili

Irakli Karbelashvili

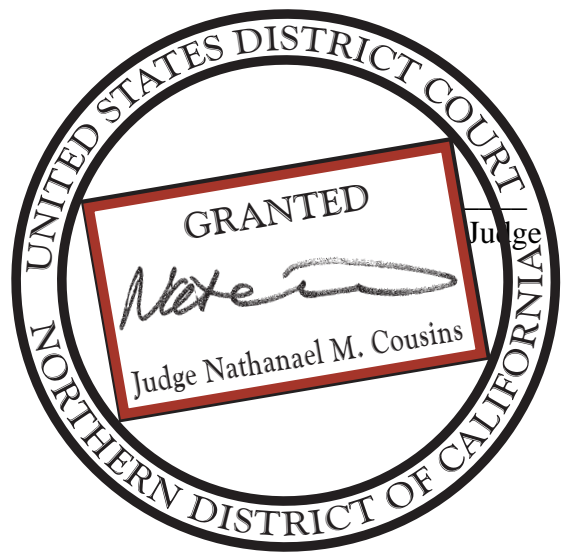
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

Having reviewed the above stipulation, and good cause having been shown, the Court dismisses this action with prejudice with each side bearing her/its own attorneys' fees, costs, and litigation expenses. The Court retain jurisdiction over the settlement agreement. The Clerk is directed to close the case file.

IT IS SO ORDERED.

Dated: May 17, 2019



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

Having reviewed the above stipulation, and good cause having been shown, the Court continues the deadline to seek leave to amend pleadings to no later than April 15, 2019. This order does not modify any of the other deadlines enumerated in the Court’s Case Management Order.

IT IS SO ORDERED

Dated: _____

United States Magistrate Judge